

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

ROBERT DOUGLAS HARTMAN,)

Defendant.)

No.: 4:07CR00405-HEA (DDN)

MOTION TO CHANGE CONDITION OF BOND

COMES NOW Defendant, and as grounds herefore, shows to the Court as follows:

1. Defendant was indicted on a nine count indictment on July 12, 2007. He was arrested on July 13, 2007 and released on bond.

2. On April 2, 2009, Defendant entered a plea of guilty to Counts 3 and 8. His sentencing is set June 23, 2009.

3. From the time of his arrest to the present date, Defendant has abided by the Order setting conditions of release.

4. As part of the conditions of release Defendant is required to be in his home from 7:00 p.m. until 7:00 a.m.

5. Defendant's juvenile daughter is engaged in playing soccer which lasts into the evening, sometimes far after 7:00 p.m. when Defendant is due to be in his home. Furthermore, Defendant requests an extension of his curfew so that he may attend and participate in other family activities. Defendant is requesting, therefore, that the time from which he is required to be in his home at night be extended to 10:00 p.m.

6. Counsel for Defendant is informed that Pretrial Services opposes the granting of this motion.

WHEREFORE, Defendant prays the Court enter an Order extending the time for allowing him to be out of the house until 10:00 p.m.

/s/Burton H. Shostak

BURTON H. SHOSTAK, #17443

Shostak & Shostak, LLC

8015 Forsyth Boulevard

St. Louis, MO 63105

Telephone: (314) 725-3200

Facsimile: (314) 725-3275

Attorneys for Defendant

Robert Douglas Hartman

CERTIFICATE OF SERVICE

I hereby certify that on 15th day of April, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

James E. Crowe , Jr

james.crowe@usdoj.gov,usamoe.crimdock@usdoj.gov,susan.dalpini@usdoj.gov

Howard J. Marcus

howard.marcus@usdoj.gov,usamoe.crimdock@usdoj.gov,julie.hurst@usdoj.gov,janet.hervatin@usdoj.gov

A copy was also served via regular U.S. Mail to:

Ms. Tiffany Corley
Pretrial Services
111 S. Tenth Street
Suite 6.345
St. Louis, MO 63102

/s/Burton H. Shostak